IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	<u>§</u>	
JETALL COMPANIES, INC.	<u>&</u> & &	Case No. 24-35761 Chapter 7
-	<u>\$</u> §	
Debtor.	<u>§</u>	

MOTION TO WITHDRAW EMERGENCY MOTION FOR ENTRY ONTO PROPERTY TO RETRIEVE BUSINESS RECORDS

TO THE HONORABLE JEFFREY P. NORMAN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Ali Choudhri ("Choudhri"), by and through its undersigned counsel, and respectfully moves to withdraw its Amended Emergency Motion for Entry Onto Property to Retrieve Business Records (*See* ECF No. 147, the "Emergency Motion") filed on April 18, 2025, and in support thereof respectfully shows the Honorable Court as follows:

- On April 18, 2025, Choudhri filed the Emergency Motion seeking authority to enter the
 premises located at 2425 West Loop South, Houston, Texas 77027 to retrieve critical
 business records necessary for the preparation and filing of required bankruptcy
 schedules and statements.
- 2. Since the filing of the Emergency Motion, circumstances have changed such that the relief requested no longer encompasses the narrow document request necessary for complete and accurate reporting of the bankruptcy schedules and statements. A more circumscribed request will be forthcoming so as to account for the separate legal existence of the Debtor and any affiliated entities.

- 3. Accordingly, the Debtor respectfully requests leave of Court to withdraw the Emergency Motion without prejudice.
- 4. This Motion is filed in good faith and not for purposes of delay.

WHEREFORE, PREMISES CONSIDERED, Choudhri respectfully requests that the Court permit the withdrawal of the Amended Emergency Motion for Entry Onto Property to Retrieve Business Records without prejudice and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

By: /s/ Justin Rayome
JUSTIN RAYOME
State Bar No. 24130709
Fed. Bar No. 3873342
1001 West Loop South, Suite 700
Houston, Texas 77027
Telephone: 214-934-9345
Email:
justin.rayome.law@gmail.com

Attorney for Ali Choudhri

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing document was filed electronically on this the <u>25th</u> day of <u>April</u>, 2025. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's ECF system.

Jeannie Lee Andresen on behalf of Creditor Harris County houston bankruptcy@lgbs.com

Thomas Michael Ballases on behalf of Creditor John Quinlan ballases@hooverslovacek.com, graham@hooverslovacek.com

Thomas Michael Ballases on behalf of Creditor Omar Khawaja ballases@hooverslovacek.com, graham@hooverslovacek.com

Thomas Michael Ballases on behalf of Creditor Osama Abdullatif ballases@hooverslovacek.com, graham@hooverslovacek.com

Charles Clayton Conrad on behalf of Creditor Houston 2425 Galleria, LLC charles.conrad@pillsburylaw.com, nancy.jones@pillsburylaw.com,docket@pillsburylaw.com

Charles Clayton Conrad on behalf of Creditor National Bank of Kuwait, S.A.K.P., New York Branch

charles.conrad@pillsburylaw.com, nancy.jones@pillsburylaw.com,docket@pillsburylaw.com

Angeline Vachris Kell on behalf of Creditor John Quinlan kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Angeline Vachris Kell on behalf of Creditor Omar Khawaja kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Angeline Vachris Kell on behalf of Creditor Osama Abdullatif kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Christopher James Kronzer on behalf of Creditor John Quinlan kronzer@hooverslovacek.com

Christopher James Kronzer on behalf of Creditor Omar Khawaja kronzer@hooverslovacek.com

Christopher James Kronzer on behalf of Creditor Osama Abdullatif kronzer@hooverslovacek.com

J Eric Lockridge on behalf of Creditor Sonder USA Inc. eric.lockridge@keanmiller.com, stephanie.gray@keanmiller.com;eric-lockridge-9072@ecf.pacerpro.com

Kell Corrigan Mercer on behalf of Petitioning Creditor EAO Global LLC kell.mercer@mercer-law-pc.com

Kell Corrigan Mercer on behalf of Petitioning Creditor M. Nasr & Partners, PC kell.mercer@mercer-law-pc.com

Justin Peter Louis Rayome on behalf of Debtor Jetall Companies justin.rayome.law@gmail.com

Jose C Rodriguez jcrodlaw@gmail.com, lettymreyna@gmail.com

Stephen Wayne Sather on behalf of Witness Stephen Sather ssather@bn-lawyers.com, plevine@bn-lawyers.com;cchristensen@bn-lawyers.com;kparsley@bn-lawyers.com;mcalderon@bn-lawyers.com

R. J. Shannon on behalf of Trustee Christopher R Murray rshannon@shannonleellp.com, rshannon@shannonleellp.com;7044075420@filings.docketbird.c om

Andrew M. Troop on behalf of Creditor Houston 2425 Galleria, LLC andrew.troop@pillsburylaw.com, nydocket@pillsburylaw.com

Andrew M. Troop on behalf of Creditor National Bank of Kuwait, S.A.K.P., New York Branch andrew.troop@pillsburylaw.com, nydocket@pillsburylaw.com

US Trustee, 7 USTPRegion07.HU.ECF@USDOJ.GOV

Jana Smith Whitworth on behalf of U.S. Trustee US Trustee, 7 jana.whitworth@usdoj.gov

/ s / Justin Rayome
Justin Rayome

Case 24-35761 Document 180 Filed in TXSB on 04/25/25 Page 5 of 7 Licing AMEX TRS Co., Inc.

Label Matrix for local noticing 0541-4

Case 24-35761

Southern District of Texas

Houston

Tue Apr 15 16:20:36 CDT 2025

Jetall Companies 1001 West Loop S Ste 700

Houston, TX 77027-9033

M. Nasr & Partners, PC

c/o Becket and Lee LLP

Malvern, PA 19355-0701

PO Box 3001

7904 N Sam Houston Pkwy W Ste 102

Houston, TX 77064-3454

National Bank of Kuwait, S.A.K.P., New York

Linebarger Goggan Blair & Sampson LLP

c/o Jeannie Lee Andersen

Houston, TX 77253-3064

P.O. Box 3064

US Trustee 7

Office of the US Trustee

515 Rusk Ave Ste 3516

Houston, TX 77002-2604

Akin Gump Strauss Hauer & Feld LLP

1111 Louisiana St. #44 Houston, Texas 77002-5248

Butler Snow LLP

1400 Lavaca St., Suite 1000 Austin, Texas 78701-1764

Clouthier Law Firm, PLLC 9950 Woodloch Forest Dr. #1300

The Woodlands, TX 77380-4252

Galleria Loop Note Holder, LLC 1001 West Loop South, Suite 700 Houston, Texas 77027-9033

Hanna and Hanna, Inc. 8582 Katy Fwy., Suite 105

Houston, Texas 77024-1807

Ian M. Cain 412 W Polk St., #1

Houston, Texas 77019-4763

United States Bankruptcy Court

PO Box 61010

Houston, TX 77208-1010

American Express-Corp Members Reward

American Express,

El Paso, Texas 79998-1535

P.O. Box 981535

CRF Holland Avenue Inc.

1614 Holland St.

Houston, Texas 77029-2818

Deal Sikes

8811 Gaylord Dr., Suite 150 Houston, Texas 77024-2960

Gill CPA & Associates 2211 Norfolk St., Houston

Texas 77098-4096

Hannah Sloan PLLC

2161 NW Military Hwy, Suite 114

San Antonio, Texas 78213-1844

Innovative Legal Solutions

5910 Rose St.

Houston, Texas 77007-5130

Clark Hill PLC

1000 Louisiana St, #2800

Houston, Texas 77002-5031

Andy Taylor

405 Main St., Unit 200

Houston, Texas 77002-1843

Christopher R. Murray

602 Sawyer St., STE 400 Houston, TX 77007-7510

EAO Global LLC d/b/a PopLabs

P.O. Box 79214

Houston, TX 77279-9214

Gulfstream Legal Group

720 N. Post Oak Rd., Suite 355

Houston, Texas 77024-3841

Harris County, et al c/o Jeannie L. Andresen

Linebarger Goggan Blair & Sampson LLP

PO Box 3064

Houston, TX 77253-3064

JLM Law Firm, P.C.

901 S. Mopac Expressway, Bldg 1, Ste 300

Austin, Texas 78746-5883

Lewis Brisbois Bisgaard & Smith LLP

24 Greenway Plaza, #1400 Houston, Texas 77046-2410 Pacer Service Center 7550 Frontage Rd San Antonio, Texas 78229 Passman & Jones 1201 Elm St., #2500 Dallas, Texas 75270-2599 Case 24-35761 Document 180 Filed in TXSB on 04/25/25 Page 6 of 7 Quadrus Consulting

7850 Parkwood Circle Dr. Suite B-3

Houston, Texas 77036-6761

13401 Country Trails Ln,
Austin, Texas 78732-2082

1980 Post Oak Blvd, Suite 1200 Houston, Texas 77056-3970

RingCentral

Poplabs

20 Davis Dr., Belmont, California 94002-3002

Ross Reporting Service, Inc

11706 Playa Ct.

Houston, Texas 77034-5406

Shanaz Choudhri

1001 West Loop South, Suite 700 Houston, Texas 77027-9033

Smart Office Automation 8316 Willow Pl Dr N Building C Houston, Texas 77070-5644 The Steidley Law Firm 3701 Kirby Dr, Suite 1170 Houston, Texas 77098-3916 Travis County Tax Office 2433 Ridgepoint De. Austin, Texas 78754-5231

U.S. Legal Support 16825 Northchase Dr., #900 Houston, Texas 77060-6004 Veritex Bank 5111 San Felipe St. Houston, Texas 77056-3603 Wrinkle, Gardner & Company, P.C. 3231 FM 528 Rd Friendswood, Texas 77546-5011

Jose C Rodriguez Jose C. Rodriguez, Trustee 1101 W. 34th Street, #223 Austin, TX 78705-1907 Justin Peter Louis Rayome 1001 West Loop South Suite 700 Houston, TX 77027-9033 Kell Mercer Kell C. Mercer, PC 901 S Mopac Expy Bldg 1 Ste 300 Austin, TX 78746-5883

Ron Madriz 5151 Richmond Ave Apt 293 Houston, TX 77056-6700

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) EAO Global LLC

(u) Houston 2425 Galleria, LLC

(u) PopLabs

(u) Sonder USA Inc.

(d) AMEX TRS Co., Inc. c/o Becket and Lee LLP PO Box 3001 Malvern PA 19355-0701 (u) John Quinlan

(u)Omar Khawaja

(u) Osama Abdullatif

(u) Stephen Sather

Case 24-35761 Document 180 Filed in TXSB on 04/25/25 Page 7 of 7

End of Label Matrix Mailable recipients Bypassed recipients Total

45

9

54